

In the Matter of )  
Connect America Fund ) WC Docket No. 10-90

<sup>3</sup> Connected Nation, Inc. is the “designated entity” for these NTIA SBI grants in Alaska, Iowa, Michigan, Minnesota, Nevada, South Carolina, Tennessee, and Texas. Its nonprofit subsidiaries operate in those states as Connect Alaska, Connect Iowa, Connect Michigan, Connect Minnesota, Connect Nevada, Connect South Carolina, Connected Tennessee, and Connect Texas, respectively. Connected Nation is the mapping contractor to the SBI grantees, the Ohio Office of Information Technology and the Puerto Rico Governor’s Office, and operates as Connect Ohio and Connect Puerto Rico in those states, respectively.

In this proceeding, Connected Nation has repeatedly supported the Commission's use of the National Broadband Map data to the extent that the data have been subject to "robust, reliable, accurate, and independent verification and field validation."<sup>4</sup> Connected Nation supports the Commission's decision to have the Wireline Competition Bureau release a proposed list of census blocks eligible for Connect America Fund subsidies, and to institute a process in which the public can review and provide comment or corrections to that data. Because creating the National Broadband Map is a continuous, iterative process, Connected Nation believes that this effort, properly implemented, can improve the Map and make it an even more robust tool for federal, state and local policymaking.

In response to the *Public Notices*, a number of providers claim discrepancies between the Commission's proposed list of eligible areas, the National Broadband Map, and more recent availability data. Commenters regularly note that Connected Nation is working proactively and cooperatively with providers in its mapping footprint. In these Reply Comments, Connected Nation provides further information regarding the Commission's proposed list of eligible areas. As noted below, a significant number of the "challenges" filed regarding broadband availability information in Connected Nation's mapping footprint can be traced back to the fact that Connected Nation has collected, validated, verified, and submitted to the NTIA broadband data that estimates coverage areas as of June 30, 2012 (submitted in October 2012), while the Commission generated its list of CAF eligible areas from the current version of the National Broadband Map that estimates coverage areas as of December 31, 2011 (based on data submitted in April 2012). Given the changing broadband landscape, a lag in the publication of the Map from data collection can be significant in areas that are seeing rapid network expansion. In Section III of these Reply Comments, Connected Nation provides information on each of the service providers that made a specific filing questioning the accuracy of the Map data in jurisdictions where Connected Nation is the SBI mapping agent.<sup>5</sup>

## **I. CONNECTED NATION'S BROADBAND MAPPING PROCESSES AND THE IMPORTANCE OF INDEPENDENT DATA VALIDATION**

Eight states have selected Connected Nation as the "designated entity" for the National Telecommunications and Information Administration's State Broadband Initiatives grant program: Alaska, Iowa, Michigan, Minnesota, Nevada, South Carolina, Tennessee, and Texas. In addition,

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<sup>4</sup> Comments of Connected Nation, Inc., on CenturyLink's Petition for Waiver, WC Docket No. 10-90, GC Docket No. 09-51, WC Docket Nos. 07-135, 05-337, 01-92, 96-45, 03-109, WT Docket No. 10-208 (filed Jul. 12, 2012) at 4; see also Comments of Connected Nation, Inc. WC Docket No. 10-90, *et al.* (filed Apr. 18, 2011) at 17-18 ("It is axiomatic that if federal subsidy dollars are to be targeted towards an "unserved" area, then the Commission should make sure that those areas are, in fact truly unserved. . . . To the extent that there is not sufficient funding in the current [ ] grants to support those validation efforts, additional funding from the Connect America Fund could possibly be directed towards those efforts.").

<sup>5</sup> While the comments of CenturyLink and Alaska Communications Systems, Inc. did include lists of census blocks that cover states mapped by Connected Nation, both of those submissions were focused on pointing out discrepancies between the data in those states currently shown on the National Broadband Map and the FCC's proposed list of eligible areas. Those comments do not, however, directly address the underlying mapping data processed by Connected Nation. See Comments of CenturyLink, WC Docket No. 10-90 (filed Jan. 9, 2013) at 5-7; Comments of Alaska Communications Services, Inc., WC Docket No. 10-90 (filed Jan. 9, 2013) at 2 ("ACS has identified 1991 unserved census blocks in Alaska that appear in the data set associated with the Public Notice, but that do not appear in the data set available for direct download from the National Broadband Map web site."). Connected Nation has, however, identified similar discrepancies between our October 2012 data submission to the NTIA and the Commission's proposed list of eligible areas. See Connected Nation, *Analysis of Connect America Fund Eligible Areas* (Jan. 7, 2013), available at <http://www.connectednation.org/fcc-maps>.

Connected Nation is the primary mapping contractor to the state designated entities in Ohio and the Territory of Puerto Rico. Pursuant to this grant program, since 2010, Connected Nation has engaged with hundreds of broadband providers, collected thousands of sets of records from those providers, and independently validated millions of records of broadband availability and speeds. This task is a continuous one, with updates due to the NTIA every six months, by April and October of each year. Pursuant to NTIA SBI program requirements, Connected Nation has developed a comprehensive protocol for soliciting, receiving, confirming, and verifying residential broadband service offerings.<sup>6</sup> Connected Nation has also employed this approach to map the broadband service areas of providers that do not willingly provide coverage data.

The result is a rich set of data that is being utilized by federal, state, and local policymakers on a daily basis to inform policy decisions. Connected Nation strongly supports the Commission's use of the National Broadband Map in targeting its Connect America Fund subsidy program. But it is important to remember that the Map, and the processes that support its generation, is also utilized by other leaders and decision makers. Indeed, the NTIA SBI grant program itself has the statutory directive to use the Map to support local technology planning teams that will "benchmark technology use across relevant community sectors," "set goals for improved technology use within each sector," and "develop a tactical business plan" for achieving those goals.<sup>7</sup> Currently, technology planning teams in over 120 communities in Connected Nation's mapping footprint are in various stages of completing these community broadband and technology plans, working with Connected Nation's local and regional outreach teams and the *Connected* portal – all of which rely upon the SBI mapping data to help these communities identify and solve broadband availability gaps. In addition, last year the Department of Health and Human Services announced that it will use the Map to guide its requirements for online access to electronic medical records in areas without ubiquitous broadband availability.<sup>8</sup>

Connected Nation understands that important policy initiatives like Universal Service Fund reform also rely on the Map, and we take our role in this process seriously. Certainly, no broadband coverage map is infallible, as the Commission's process has shown. But apparently unlike other mapping agents, Connected Nation relies upon multiple means of data validation – including on-the-ground field work where required – ***before it submits data to the NTIA for placement on the Map.*** Connected Nation interprets the NTIA's program rules as expecting that commitment and attention to detail from us. In the instances in which a provider has presented Connected Nation implausible broadband service coverage areas or speeds, Connected Nation has not simply submitted the data with fingers crossed and a plan to review only if that data is questioned later. Instead, in such cases Connected Nation examines the data closely and seeks to validate it ***before*** including it in a data submission to the NTIA.

Providers are also offered multiple opportunities each year to review and modify their broadband service areas and speeds as part of each and every mapping submission cycle. For providers already on

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<sup>6</sup> Comments of Connected Nation, Inc. on CenturyLink's Petition for Waiver, In the Matter of Connect America Fund, WC Docket No. 10-90 et. al., July 12, 2012 (available at <http://apps.fcc.gov/ecfs/document/view?id=7021986458>). "Engineering and Technical Services Field Validation Techniques: A Technical Brief by Connected Nation", presented to the FCC, June 22, 2011 (available at <http://apps.fcc.gov/ecfs/document/view?id=7021689631>); Comments of Connected Nation, In the Matter of Connect America Fund, WC Docket No. 10-90 et. al., April 18, 2011 (available at <http://apps.fcc.gov/ecfs/document/view?id=7021239880>).

<sup>7</sup> Broadband Data Improvement Act of 2008, 47 U.S.C. 1304(e)(5).

<sup>8</sup> Department of Health and Human Services, Centers for Medicare and Medicaid Services, *Medicare and Medicaid Programs; Electronic Health Record Incentive Program—State 2*, Final Rule, 77 Fed. Reg. 53968, 54010 (Sep. 4, 2012).

the Map, Connected Nation proactively requests data updates every six months and seeks to obtain confirmation from those providers that the data on the Map is still accurate. Connected Nation begins the process of reaching out to providers four months before the NTIA's April and October submission deadlines, in order to offer adequate time to receive, process, and validate any service area updates. For example, for the data that Connected Nation submitted to the NTIA in October 2012, it began to reach out to service providers in June of 2012, asking them to confirm or update their broadband service areas as of June 30, 2012. These data were generally received, processed, and validated in July and August 2012, and processed further and confirmed in September 2012.

In addition, once Connected Nation has processed and validated a provider's footprint, Connected Nation gives the collaborating provider a map of the areas and offerings and asks for confirmation *before* Connected Nation submits the data to the NTIA. Connected Nation also publishes state-based versions of its maps on its state program websites. These interactive state maps, such as <http://www.connectnv.org/interactive-map>, show data current as of the most-recent data collection cycle, frequently one generation more recent than the National Broadband Map. As a result, broadband providers in Connected Nation's mapping jurisdictions have ample opportunity to view and propose revisions to their broadband service areas.

The comments submitted to the Commission in this docket generally indicate that this collaborative process, coupled with Connected Nation's independent validation process, is working. As described below, a number of providers offering service in Connected Nation's mapping footprint have requested that the Commission should adjust its proposed list of eligible areas precisely because Connected Nation's state maps that use data processed by Connected Nation for the October 2012 data cycle indicates that updates to the Map are necessary. The following section addresses specific concerns that a few providers have raised and notes the circumstances in which the providers have (or have not) brought this information to Connected Nation's attention.

## **II. RESPONSE TO BROADBAND COVERAGE CLAIMS WITHIN CONNECTED NATION'S MAPPING FOOTPRINT**

In this Section, Connected Nation responds to the filings of several providers that have pointed out discrepancies or issues with the Commission's proposed list of eligible areas for Connect America Fund Phase I incremental support funding. Many of these providers have worked cooperatively with Connected Nation, and their filings center on the fact that the Commission's proposed list of eligible areas, since it is based on the current version of the National Broadband Map, is not based on the most recent data that Connected Nation has received, reviewed, and submitted to the NTIA. Connected Nation also addresses and identifies providers that have not participated in the SBI mapping program, or which have not provided current information to Connected Nation as part of that process until recently.

### **ALASKA - General Communication, Inc. (GCI)<sup>9</sup>**

In its comments, GCI identifies new areas where it claims to offer fixed broadband service at speeds of at least 3 Mbps download speeds and 768 kbps upload speeds. GCI admits in its comments that it had not provided to Connected Nation most of the service territory data identified in its filing, but that it

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<sup>9</sup> Letter from John T. Nakahata, Counsel for General Communications, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (filed Jan. 11, 2013) (attaching corrected version of errata to Jan. 9, 2013 Comments of General Communications, Inc.).

would work with Connected Nation to get this information on the National Broadband Map. As of this writing, GCI has recently provided Connected Nation the claimed coverage territory it provided to the Commission on January 11, 2013, for purposes of data evaluation and validation. Connected Nation is awaiting further data from GCI regarding other speed tiers and technologies that it claims to be offering. Connected Nation will continue working with GCI to assess, validate, and process its updated data per its standard procedures. It is expected that any updates to GCI's broadband service offerings that result from this new data will be processed as part of the current mapping update process, and will be reflected in Connected Nation's data submission to the NTIA by April 2013.

**ALASKA - SPITwSPOTS, Inc.**<sup>10</sup>

SPITwSPOTS' comments indicate that it submitted updated data to Connected Nation during the latest SBI mapping update (October 2012) and that this expanded service territory is not reflected in the Commission's list of eligible areas. Based on these most recent data that Connected Nation submitted to the NTIA in October 2012, Connected Nation confirms that SPITwSPOTS is indeed offering fixed broadband service at or above the 3 Mbps down/768 kbps up threshold in the census blocks identified in SPITwSPOTS' filing in this docket, either fully or partially served. For more information on the SPITwSPOTS service territory and Connected Nation's field validation efforts, see Connected Nation's response to ACS's petition for waiver in this docket.<sup>11</sup>

**IOWA - F&B Communications**<sup>12</sup> (Corrected)

F&B Communications is a service provider in the state of Iowa and a beneficiary of the Department of Agriculture, Rural Utilities Service Broadband Initiative Program (BIP) grant program in 2009-2010. As a result, it is currently expanding its network capacity and broadband service territory. F&B Communications has historically collaborated with the SBI mapping program in the state of Iowa. During the last completed SBI mapping submission cycle, F&B provided updates to both its fiber and DSL networks. These updates are reflected in the current version of the Connect Iowa broadband map but those service areas are not reflected in the Commission's list of proposed eligible areas. Based on Connected Nation's most recent broadband availability data in Iowa, submitted to the NTIA in October 2012, Connected Nation confirms that F&B Communications is indeed offering fixed broadband service at or above the 3 Mbps down/768 kbps up threshold in the census blocks identified in F&B Communications' filing in this docket, either fully or partially served.

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<sup>10</sup> Comments of SPITwSPOTS, Inc., WC Docket No. 10-90 (filed Jan. 9, 2013).

<sup>11</sup> Connected Nation Comments, Petition for Waiver of ACS of Anchorage, Inc., ACS of the Northland, Inc., ACS of Fairbanks, Inc., and ACS of Alaska, Inc., Federal Communications Commission, WC Docket Nos. 10-90, 05-337 (filed Oct. 9, 2012) (available at [http://www.connectednation.org/sites/default/files/10\\_30\\_12\\_ex\\_parte\\_cn\\_response.pdf](http://www.connectednation.org/sites/default/files/10_30_12_ex_parte_cn_response.pdf); see also Letter from Thomas M. Koutsky, Chief Policy Counsel, Connected Nation, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 10-90, 05-337 (filed Oct. 30, 2012).

<sup>12</sup> Comments of F&B Communications Inc., WC Docket No. 90-10 (filed Jan. 9, 2013).

**IOWA - Cable One<sup>13</sup>**

The American Cable Association's (ACA) comments attach declarations of several member companies, one of which is Cable One, a cable operator offering service in several states, including Iowa. In this attachment, Cable One identifies areas in Iowa where it claims to provide broadband service that is not reflected on the current version of the National Broadband Map or the Commission's list of eligible census blocks. These alleged expanded broadband service areas are also not reflected on the latest Connect Iowa broadband map,<sup>14</sup> which is based on the October 2012 SBI data submission to the NTIA.

Connected Nation works collaboratively with Cable One as part of the SBI mapping grant in Iowa. Per its standard provider outreach protocols for each SBI mapping cycle, Connected Nation has regularly reached out to Cable One to request updates to its claimed service territory in Iowa. However, the last update received by Connected Nation for this provider in Iowa was received and submitted as part of the April 2012 SBI data submission to the NTIA and is now reflected in the National Broadband Map. Cable One confirmed the accuracy of service territory with Connected Nation's engineering team prior to that April 2012 submission. Since that submission, Cable One has not provided Connected Nation any updates to its broadband service territory or offerings in Iowa. In conjunction with the data collection process for the October 2012 submission, Connected Nation's engineering team sought updated information from Cable One, and the provider stated that there were no changes from the April 2012 service area. Connected Nation has not received any updated or modified data from the provider, even in conjunction with its current outreach for the upcoming April 2013 data submission.

**IOWA - Independence Telecommunications Utility<sup>15</sup>**

Another company that filed information attached to the ACA comments was Independence Telecommunications Utility in Iowa. Independence identifies townships in Buchanan County (IA) where it claims to provide broadband service that is not reflected on the current version of the National Broadband Map or the Commission's list of eligible census blocks. These alleged expanded broadband service areas are also not reflected on the latest Connect Iowa broadband map, which is based on the October 2012 SBI data submission to the NTIA.

Connected Nation works collaboratively with Independence as part of the SBI mapping grant in Iowa. Per our standard provider outreach protocols, for each SBI mapping cycle, Connected Nation has reached out to Independence to request updates to its claimed service territory in Iowa. However, Independence has not updated its coverage area since the initial Iowa data submission to NTIA in May 2010. Independence confirmed that service territory with Connected Nation's engineering team prior to that May 2010 submission. In the five data submission cycles since that May 2010 submission, Independence has not provided Connected Nation any updates to its broadband service territory or offerings in Iowa. In conjunction with the data collection process for those five data submissions, Connected Nation's engineering team sought any updated information from Independence, and the provider stated that there have not been any changes. Connected Nation is currently conducting outreach to this provider for updates to include with the April 2013 NTIA submission.

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<sup>13</sup> Comments of The American Cable Association, WC Docket No. 10-90 (filed Jan. 9, 2013), Exh. B (Cable One).

<sup>14</sup> Connect Iowa is a subsidiary of Connected Nation working in the State of Iowa. Iowa broadband maps can be found at <http://www.connectiowa.org/mapping/state>

<sup>15</sup> Comments of The American Cable Association, WC Docket No. 10-90 (filed Jan. 9, 2013), Exh. M (Independence Telecommunications Utility).



**MICHIGAN – Lighthouse.Net**<sup>16</sup>

Lighthouse.Net is a service provider in Michigan that states that it offers broadband service in areas reflected in the Commission's list of eligible areas. Lighthouse states that this expanded coverage area was submitted to Connected Nation and was reflected in the October 2012 SBI data submission. Lighthouse has been a consistent participant in the SBI mapping process in Michigan and has routinely provided and updated Connected Nation data on its broadband service territory. Based on Connected Nation's most recent broadband availability data in Michigan, submitted to the NTIA in October 2012, Connected Nation confirms that Lighthouse is indeed offering fixed broadband service at or above the 3 Mbps down/768 kbps up threshold in the census blocks identified in Lighthouse's filing in this docket, either fully or partially served. In particular, based on the most recent data, there are a total of 8 census blocks that are fully served and one partially served that are included in the Commission's proposed list of eligible areas for Connect America Fund Phase I funding.

**MICHIGAN - Crystal Automation Systems**<sup>17</sup>

Crystal Automation Systems is a BIP grant recipient in Michigan and is expanding its broadband network. In its comments in this docket, it claims that it now serves areas that are not reflected in the current version of the National Broadband Map and the Commission's list of eligible areas. Crystal Automation Systems has been a consistent participant in the SBI mapping process in Michigan and has routinely provided and updated Connected Nation data on its broadband service territory. Connected Nation can confirm that during the April and October 2012 SBI data submissions, Crystal Automation Systems submitted updates to its service territory that reflected extensive changes to its previous coverage area. These changes are consistent with its ongoing build-out of its fixed wireless broadband network in the state. Based on Connected Nation's most recent broadband availability data in Michigan, submitted to the NTIA in October 2012, Connected Nation confirms that Crystal Automation Systems is indeed offering fixed broadband service at or above the 3 Mbps down/768 kbps up threshold in the census blocks identified in its filing in this docket, either fully or partially served. These areas are not reflected in the Commission's list of eligible areas, but they are reflected in the current version of the Connect Michigan broadband map.<sup>18</sup>

**MINNESOTA - Leech Lake Band of Ojibwe (LLBO)**<sup>19</sup>

The Leech Lake Band of Ojibwe (LLBO) submitted comments asserting that the National Broadband Map and the Commission's list of eligible areas understate the availability of broadband on their Tribal Lands. Even before this filing, Connected Nation has been in an active and cooperative dialogue with LLBO leaders regarding their questions about the Map. Early next month, Connected Nation will be sending a field engineering validation team to the area to engage in a sustained onsite field verification and validation exercise alongside LLBO Tribal leaders, to help them better understand the broadband landscape in their area. During this field validation and verification trip, four Connected Nation engineers will visit LLBO Tribal Lands to conduct extensive field testing and due diligence to (i) verify the data

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<sup>16</sup> Letter from Stephen Mason, General Manager, Lighthouse.Net, to Office of the Secretary, Federal Communications Commission, WC Docket No. 10-90 (filed Jan. 9, 2013).

<sup>17</sup> Comments of Crystal Automation Systems, Inc., WC Docket No. 10-90 (filed Jan. 9, 2013).

<sup>18</sup> Connect Michigan is a subsidiary of Connected Nation working in the State of Michigan. Michigan broadband maps can be found at <http://www.connectmi.org/mapping/state>

<sup>19</sup> Comments of Leach Lake Band of Ojibwe Tribal Council, WC Docket No. 10-90 (filed Jan. 9, 2013).

displayed on the Connect Minnesota broadband map (which depicts SBI broadband coverage of >768 kbps x 200 kbps), (ii) identify and analyze the census blocks eligible for Connect America Fund subsidies; and (iii) obtain information on 46 Community Anchor Institutions (CAIs) that lie within the boundaries of the LLBO Tribal Lands.<sup>20</sup>

**MINNESOTA - Midcontinent Communications<sup>21</sup>**

Midcontinent Communications in the state of Minnesota has historically collaborated with the SBI mapping program. In its Comments, Midcontinent claims that the Commission's list of eligible areas understates the extent of its service territory. However, based on the data submitted by the provider on the record, Connected Nation cannot confirm or interpret these claims at this time. Midcontinent is currently working to submit updated data of its service territory to Connected Nation. Connected Nation will work with the provider to collect, validate, and process the updated data, which it expects to be reflected in the April 2013 SBI data submission to the NTIA.

**OHIO - Country Communications<sup>22</sup>**

Country Communications of Ohio submitted comments to the Commission, alleging additional broadband service territory that is not reflected in the current National Broadband Map or the Commission's list of eligible areas. Country Communications states that this expanded coverage area was submitted to Connected Nation through the Ohio SBI mapping program and was reflected in the October 2012 SBI data submission. Based on Connected Nation's most recent broadband availability data in Ohio, submitted to the NTIA in October 2012, Connected Nation confirms that Country Communications is indeed offering fixed broadband service at or above the 3 Mbps down/768 kbps up threshold in the census blocks identified in Country Communications' filing in this docket, either fully or partially served.

**OHIO - Intelliwave, LLC<sup>23</sup>**

Intelliwave, LLC is a wireless service provider and a BIP grant recipient in the state of Ohio that is actively expanding its broadband network. In its comments to the Commission it claims to serve areas that are not reflected in the current version of the National Broadband Map and the Commission's list of eligible areas. Intelliwave has historically collaborated with the Ohio SBI mapping program. Connected Nation can confirm that in the October 2012 SBI data submissions, Intelliwave submitted updated data of its service territory that reflected extensive changes to its previous coverage area. These updates are not reflected in the Commission's list of eligible areas, but they are reflected in Connected Nation's October 2012 data submission to the NTIA and are also represented in the current version of the Connect Ohio broadband map.<sup>24</sup>

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<sup>20</sup> Connect Minnesota is a subsidiary of Connected Nation working in the State of Minnesota. Minnesota broadband maps can be found at <http://www.connectmn.org/mapping/state>

<sup>21</sup> Comments of Midcontinent Communications, WC Docket No. 10-90 (filed Jan. 9, 2013).

<sup>22</sup> Comments of Mark Stephenson, Country Connections Engineer/Part Owner, WC Docket No. 10-90 (filed Jan. 8, 2013).

<sup>23</sup> Comments of Intelliwave, LLC, WC Docket No. 10-90 (filed Jan. 9, 2013).

<sup>24</sup> Connect Ohio is a subsidiary of Connected Nation working in the State of Ohio. Ohio broadband maps can be found at <http://connectohio.org/mapping/state>



**OHIO - Nelsonville TV<sup>25</sup> (Corrected)**

Nelsonville TV (Ohio) filed an attachment to the ACA Comments that identifies certain areas where it claims to provide broadband service of at least 3 Mbps download speeds and 768 kbps upload speeds. Nelsonville TV has in the past collaborated with the SBI mapping program in Ohio. Nelsonville provided Connected Nation broadband inventory data as part of the Spring 2010 SBI data submission. Since then, Connected Nation has requested data updates from the provider multiple times and in each of the five completed mapping data collection cycles, Nelsonville has either replied to Connected Nation's inquiries that it does not have any updates to the service territory and speeds that it provided in 2010, or been non-responsive to the outreach effort. On January 4, 2013, as part of the current NTIA mapping data submission cycle, Nelsonville provided updated broadband information to Connected Nation. Connected Nation will assess, validate, and process this updated data per its standard procedures. It is expected that any updates to the Map that result from this new data will be processed as part of the current data update cycle and will be reflected in Connected Nation's data submission to the NTIA by April 2013.

**OHIO - Southern Ohio Communications Services (SOCS)<sup>26</sup>**

In its comments, Southern Ohio Communications Services (SOCS) claims that the Commission's list underestimates portions of its service territory. Southern Ohio Communications Services has historically collaborated with the Ohio SBI mapping program. The last data update from SOCS to Connected Nation was submitted in the fall of 2011 and is reflected in the Connect Ohio October 2011 SBI data submission. Per standard protocols, Connected Nation has requested data updates from the provider twice yearly, including the April 2012 and October 2012 data submission cycles. Southern Ohio Communications Services was non-responsive to Connected Nation's inquiries and has not provided any updates to the service territory and speeds that it provided Connected Nation in conjunction with the October 2011 SBI data submission that is now reflected on the National Broadband Map.

**NEVADA - SatView<sup>27</sup>**

SatView (Nevada) filed an attachment to the ACA Comments that identifies new areas in Nevada where it claims to provide broadband service at speeds of at least 3 Mbps download speeds and 768 kbps upload speeds. SatView has not submitted information to Connected Nation reflecting these additional service areas in any of the SBI program data collection cycles. SatView has in the past collaborated with the SBI mapping program in Nevada. The last broadband inventory data update SatView provided to Connected Nation was reflected in the October 2011 SBI data submission. Since then, Connected Nation has requested data updates from the provider twice yearly, including the April 2012 and October 2012 data submission cycles. SatView confirmed in response to Connected Nation's data collection inquiries in 2012 that it does not have any updates to the service territory and speeds that it provided Connected Nation in conjunction with the October 2011 SBI data submission. Recently, as part of the April 2013 data submission round, SatView is now working with Connected Nation and has submitted updated service data. Connected Nation will work with SatView to validate and process the updated data, which it expects to be reflected on the April 2013 SBI data submission to the NTIA.

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<sup>25</sup> Comments of The American Cable Association, WC Docket No. 10-90 (filed Jan. 9, 2013), Exh. O.

<sup>26</sup> Comments of Southern Ohio Communications Services Inc., WC Docket No. 10-90 (filed Jan. 9, 2013).

<sup>27</sup> Comments of The American Cable Association, WC Docket No. 10-90 (filed Jan. 9, 2013), Exh. N.

**SOUTH CAROLINA - West Carolina Rural Telephone Cooperative**<sup>28</sup>

In its comments, the West Carolina Rural Telephone Cooperative of South Carolina claims to serve areas that are not reflected in the current version of the National Broadband Map and the Commission's list of eligible areas. Based on Connected Nation's most recent broadband availability data in South Carolina, submitted to the NTIA in October 2012, Connected Nation confirms that West Carolina Rural Telephone Cooperative does indeed offer fixed broadband service in the census blocks identified in its filing in this docket, either fully or partially served. Connected Nation is currently conducting data validation efforts to confirm speeds offered by the provider across its service territory.

**TEXAS - TransWorld Network, Corp.**<sup>29</sup>

In its comments, TransWorld Network claims to serve areas in the state of Texas that are not reflected in the current version of the National Broadband Map and the Commission's list of eligible areas. Starting in April 2012, Connected Nation has made efforts to engage TransWorld and its rural electric company partner in the Texas SBI mapping program. Connected Nation's understanding is that TransWorld is building its network in Texas. Currently, TransWorld is in the process of establishing a working relationship with Connected Nation that will enable it to submit broadband service territory data to the SBI mapping program. Connected Nation will work with TransWorld to collect, validate, and process its network coverage data, which it expects to be reflected on the April 2013 SBI data update.

**III. CONCLUSION**

As a State Broadband Initiative mapping grantee and contractor, Connected Nation takes its role in the process of creating the National Broadband Map seriously. These Reply Comments outline the approach that Connected Nation takes in soliciting, receiving, validating, processing, and submitting broadband availability data that supports the Map. This description emphasizes the role that independent validation, including field validation, plays in Connected Nation's work.

As noted above, broadband mapping is a continuous process. Connected Nation is currently receiving, reviewing, and attempting to validate new and revised data as part of the current data collection cycle, which is due to the NTIA in April 2013. Likely as a result of the Commission's process, Connected Nation has received requests to update the Map from a number of providers listed above. Connected Nation stands ready and willing to provide the Commission with updates of our progress in reviewing these newly received data files as we process them in the normal course of our grant obligations and deadlines.

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<sup>28</sup> Comments of West Carolina Rural Telephone Cooperative, WC Docket No. 10-90 (filed Jan. 9, 2013).

<sup>29</sup> Comments of TransWorld Network, Corp., WC Docket No. 10-90 (filed Jan. 9, 2013).